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**FILED**  
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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
LAFAYETTE DIVISION

ERROL GREIG, SUE GREIG, MARY MARTHA PIERRE,  
RONALD CHARLES, PALMER JOHNSON,  
DARREL CEASAR, AND MURPHY SIMON

versus

CITY OF ST. MARTINVILLE AND  
UNITED STATES OF AMERICA,

**CV00-0603-L0**  
DOCKET NO.

**JUDGE DOHERTY**

**MAGISTRATE JUDGE METHVIN**

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**COMPLAINT**

This is an action brought by Complainants, Errol Greig, Sue Greig, Mary Martha Pierre, Ronald Charles, Palmer Johnson, Darrel Ceasar, and Murphy Simon, pursuant to the 14<sup>th</sup> and 15<sup>th</sup> Amendments to the Constitution of the United States and to 42 U.S.C.S § 1971 et seq. The Complainants seek declaratory relief to enforce elections which have been suspended for a ten year period by the City of St. Martinville and the Justice Department of the United States Government.

**I.**

**JURISDICTION**

This Court has jurisdiction pursuant to 42 U.S.C.S. § 1973, 1973 (c), 1973j(d) and 1973j(f). A three judge panel is required to determine this matter pursuant to 42 U.S.C.S. 1973(a).

**II.**

**VENUE**

This dispute arises within the Parish of St. Martin, State of Louisiana, a territorial district of the U. S. District Court for the Western District of Louisiana.

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III.

**PARTIES PLAINTIFF**

All Complainants are citizens of the United States of America and the State of Louisiana and are registered voters in the City of St. Martinville.

IV.

**PARITES DEFENDANT**

The City of St. Martinville is a political subdivision of the State of Louisiana which is, by charter and State law, required to have periodic elections.

V.

The United States of America is a sovereign nation; the United States Justice Department is a subdivision of the government of the United States of America.

VI.

**FACTUAL ALLEGATIONS**

The City of St. Martinville has a five member City Council. The present council was elected on April 7, 1990, and its members took office in June of 1990.

VII.

The next scheduled election was set for the Spring of 1994; in January 1994, the election was pre-empted by the United States Justice Department, which was allegedly studying a re-districting plan submitted by the St. Martinville City Council. The elections were suspended pursuant to 42 U.S.C.S. § 1973 et seq. and regulations appertaining thereto.

VIII.

Since that time, no elections have taken place; the City of St. Martinville has failed to supply the United States Department of Justice with an acceptable voting plan; the United States Department of Justice has not established any known deadline for the City of St. Martinville to comply.

## IX.

The re-districting plans set forth by the City of St. Martinville are required by federal law and by administrative regulations of the United States Department of Justice to satisfy racial discrimination concerns; however, such plans have been effected in dozens of voting districts though out the United States of America without a ten year paralysis of elections.

## X.

### CAUSES OF ACTION

The acts complained of herein constitute a violation of the First, Fourteenth and Fifteenth Amendments to the Constitution of the United States and of 42 U.S.C.S. § 1983 and 1985, and 42 U.S.C.S. § 1971 et seq.

## XI.

### RELIEF SOUGHT

Complainants seek an order of this Court establishing deadlines by which the defendants must agree on and submit a plan or be held in contempt, or, alternatively, Complainants seek this Honorable Court's decree on redistricting with an order that elections take place within a specified time frame.

### PRAYER

WHEREFORE, the Complainants, Errol Greig, Sue Greig, Mary Martha Pierre, Ronald Charles, Palmer Johnson, Darrel Ceasar, and Murphy Simon, pray that after all due proceedings be had expeditiously, that this Honorable Court issue a Judgment in their favor and against defendants, City of St. Martinville, ordering the defendants and their agents and/or attorneys to approve a plan for redistricting the City Council member seats of the City of St. Martinville; or that this Honorable Court set elections for such a time the Court deems appropriate; and that the Court award Complainants costs and reasonable attorney's fees, and for any and all other such relief as may be just in the premises.

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Respectfully submitted,

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**ATTORNEY FOR COMPLAINANTS**